

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUAN HERNANDEZ, DEQUAN
KIRKWOOD, MANUEL TREVINO,
KENT WHEATFALL, and ERIC
AGUIRRE on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

THE CITY OF HOUSTON, TEXAS,

Defendant.

CIVIL ACTION NO. 4:16-CV-3577

Joint Motion to Continue Fairness Hearing

This Court scheduled a final fairness hearing in the above-captioned matter for December 10, 2020. Because the settlement agreement and notice plan in this case allow 120 days for any class member to consider the agreement and file an objection or request for exclusion, and because the agreement allows 30 days for the administrator to receive the settlement fund and prepare the notices, the parties jointly request that this Court continue the final fairness hearing until a date certain no later than **March 22, 2021**.

Respectfully submitted,

/s/ Charles Gerstein

Civil Rights Corps
1601 Connecticut Ave. NW, Suite 800
Washington, DC 20009
charlie@civilrightscorps.org
(202) 894-6128

/s/ Anna Rotman

Kirkland & Ellis LLP
609 Main St., Suite 4600,
Houston, TX 77002
713-836-3750

Anna.rotman@kirkland.com

/s/ Lena S. Cohen

/s/ Maisie Allison

Kirkland & Ellis LLP

555 South Flower Street,

Los Angeles, CA 90071

(213) 680-8265

Lena.cohen@kirkland.com

Attorneys for Plaintiffs

/s/ Sean Gorman

/s/ Daisy Puente

Bracewell LLP

711 Louisiana Street, Suite 2300

Houston, TX

77002-2770

sean.gorman@bracewell.com

Attorneys for Defendant